

Maggie Mason:

Statement to DC&R Committee – as spoken on 2 October 2020

Thank you Chair:

Officers acknowledge SLACC was right that:

- WCM **DID** have to consider end use GHG emissions because the 2016 Scoping Opinion is binding;
- End use GHG emissions can only be zero **if** “substitution” can be demonstrated,
- The mine’s impact on **global emissions matters**, not just UK emissions; and
- Use of coking coal in UK and EU steelmaking will **NOT** be the same in 2070 as in 2020,

But the officers claim that that **significant reductions in the** use of coking coal in UK and EU will only be significantly reduced by 2050 **is still wrong** –

SSAB’s email to the Council said that their Hybrit demonstration plant, with 2 supporting blast furnaces and a BOF will be in production in 2025, and will produce 1 Mtpa.

15 years later takes us to 2040 not 2050. And as some blast furnaces will be due to be relined or abandoned soon after 2025 there will be a progressive reduction in coking coal use up to 2040. Hence substitution to 2050 will **NOT be 100%**, there will be additional coal, and therefore there must be **additional GHG** that need to be counted.

Professor Ekins’ recent letter emphasises that this cheaper coal from WCM will depress the regional price and influence decisions to take up lower carbon steel technologies and that anything less than 100% substitution over the entire lifetime of the mine would increase GHG emissions.

I appreciate officers efforts to find out about the sulphur content of WCM coal and whether it can substitute for US (and other) HVA coal.

BUT....

- WCM have quoted a new range of 1.6-1.8% sulphur content– I think that Paul Haggin said the WCM mine was 1.6%-
- WCM has not supplied the specification of its coal, now that the middlings coal is not being sold separately, and steel companies have been unable to commit clearly on whether they can use it.
- However British Steel has said that they can’t use it. This is because their operating licence limits their sulphur inputs (see paragraph 7.328).
- The only other significant UK steel maker, Tata Steel , has said that it depends on the specification. They would have to change their coking coal mix to meet their sulphur limits. Many European blast furnaces have similar limits, because sulphur causes acid rain.

So the answer to Hilary Carrick’s question is that roughly half or less of the HVA coal needed for the UK will be substituted for by this mine, even at the Council’s definition and planning condition.

The bottom has fallen out of the NEED argument for this mine.

How can the Council claim that this coal meets the needs of the UK steel industry; that it is a supply of critical raw material; will boost the national balance of payments, and bring 500 jobs to West Cumbria? The weighting given to these aspects in the planning balance are too high.

On the other hand, if the coal doesn't substitute for US (or lower sulphur Australian coal), the coal will be additional. So the Scoping Report requires that the end user GHG and their harms are assessed and given a higher weighting as an unacceptable environmental harm.

The report accepts unacceptable damage to Tourism, saying it was not enough on its own to require refusal, but in conjunction with the climate change impacts, and other considerable harms to the Historic Environment, visual and landscape impacts, they outweigh the moderate benefits from this development. Neither has the council demonstrated a need for coking coal of this specification, or any "wholly exceptional" circumstances to justify the damage to Ancient Woodlands.

The proposal, even with its restricted life and conditions on the specification of the coal, does not have benefits that clearly outweigh the significant harms, and the application should be refused.